

DATE OUT: 01/AUG/2011

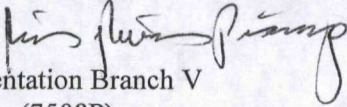
SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 390774

REG./FILE SYMBOL NO.: 71910-2

PRODUCT NAME: ThermaCELL® Mosquito Repellent MRID NOS.: 471424-01, 474064-01, 484726-01

COMPANY NAME: The Schawbel Corporation c/o Scientific Coordination, Inc. ACTION CODE: 676

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INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 2580, was issued in June 2007 and revised in May 2009 for the Active Ingredient Allethrins, which include the active ingredient d-allethrin (Pynamin Forte), PC Code 00405. According to the RED, the generic data base supporting the reregistration of Allethrins for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Allethrins RED, the Schawbel Corporation c/o Scientific Coordination, Inc. provided a basic Confidential Statement of Formula (CSF), dated 04/28/10; a draft label (received 2/10/11); EPA Form 8570-35 (9-97) (Data Matrix), dated 02/07/11; and is citing product chemistry data from EPA Reg. No. 71910-4 (MRID numbers 471424-01, 474064-01, and 484726-01,) to support the reeregistration of Reg No. 71910-2.

FINDINGS:

1. EPA Reg No. 71910-2 is an end-use product containing the active ingredient d-Allethrin at a label nominal concentration of 21.97%. This product is an insecticide intended for use as a mosquito repellent in outdoor areas with minimal air movement, as specified on the label. The product is toxic to fish, shrimp, and aquatic invertebrates. The product is produced by a non-integrated system
2. According to the CSF, the subject project is a 100% repack of EPA Reg. No. 43917-7, alternate formulation "A". However, data from Reg. No. 43917-7 are not yet available. The registrant has instead cited the data from EPA Reg. No. 71910-4 (MRID numbers 471424-01, 474064-01,) and 484726-01, a substantially-similar product. Product chemistry data generated from this product may be used to support the subject product. The data from EPA Reg. No. 71910-4 were reviewed and accepted by PRD/RMIB V on 4/4/11 and 6/1/11 under DP numbers 386753 and 389711, respectively. The Group A requirements pertaining to Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical method, as well as the Group B data (CFR No. 158.310) which pertain to the Physical and Chemical Properties of the product, are all satisfied.

3. Since no data are available for the supposed "parent" product (Reg. No. 43917-7), it is no longer appropriate to call the subject product a 100% repack of Reg. No. 43917-7, therefore, the CSF needs to be revised showing information on the subject product's formulation since product chemistry data were generated from the product itself (similar to Reg. No. 71910-4).
4. The Ingredients Statement on the draft label is acceptable as per CFR §156.10(g) and PR notices 91-2 and 97.6. There are no data present that would trigger the need for a Physical or Chemical Hazards Statement on the label. The Storage and Disposal Statements are acceptable in accordance in with 40 CFR §156.10(g) and PR Notice 83-3. However, we suggest that the registrant box off the Storage and Disposal Statement on page 6 of the draft label with a solid line in order to increase its prominence.

CONCLUSIONS:

Except for Finding 3, the registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 71910-2.